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The Honorable Roger Wicker Ranking Member, US Senate Committee on Commerce, Science, and Transportation 555 Dirksen Senate Office Building Washington, DC 20510	The Honorable Patty Murray Chairwoman, US Senate Committee on Health, Education, Labor, and Pensions 154 Russell Senate Office Building Washington, D.C.
The Honorable Richard Burr Ranking Member, US Senate Committee on Health, Education, Labor, and Pensions 217 Russell Senate Office Building Washington, DC 20510	The Honorable Robert Scott Chairman, US House Committee on Education and Labor 2328 Rayburn House Office Building Washington, DC 20515

Plaintiff's

Exhibit C

BACB v. Moates

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The Honorable Virginia Foxx Ranking Member, US House Committee on Education and Labor 2462 Rayburn House Office Building Washington, DC 20515	The Honorable Eddie Bernice Johnson Chairwoman, US House Committee on Science, Space, and Technology 2306 Rayburn Office Building Washington, DC 20515
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The Honorable James Comer Ranking Member, US House Committee on Oversight and Reform 2410 Rayburn HOB Washington, DC 20515	

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The Honorable Joseph R Biden, Jr. Executive Office of the President The White House 1600 Pennsylvania Avenue, N.W. Washington, DC 20500	The Honorable Kamala Harris Office of the Vice President President of the United States Senate Eisenhower Executive Office Building Washington, DC 20501
Dr. Jill Biden Office of the First Lady The White House 1600 Pennsylvania Avenue, N.W. Washington, DC 20500	Dr. Alondra Nelson Director, Office of Science and Technology Policy Eisenhower Executive Office Building 1650 Pennsylvania Avenue Washington, D.C. 20504

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Ambassador Susan Rice, DPhil Director, Domestic Policy Council Room 469, Eisenhower Executive Office Building, Washington, DC 20502	Cedric Richmond, Esq Director, Office of Public Engagement 1600 Pennsylvania Avenue NW. Washington, DC 20500
The Honorable Xavier Becerra, Esq Secretary of Health and Human Services 200 Independence Avenue SW. Washington, DC 20201	The Honorable Merrick Garland, Esq Attorney General of the United States 950 Pennsylvania Avenue NW. Washington, DC 20530
The Honorable Miguel Cardona, EdD Secretary of Education 400 Maryland Avenue SW. Washington, DC 20202	The Honorable Lloyd Austin, GEN, USA (ret.) Secretary of Defense The Pentagon Washington, DC 20301-1155
The Honorable Gina Raimondo, DPhil, Esq Secretary of Commerce Fourteenth St. and Constitution Avenue NW. Washington, DC 20230	Commissioner Lina Khan, Esq Chair of the Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580
Commissioner Charles Rettig Internal Revenue Service 1111 Constitution Ave, NW Washington, DC 20224	Commissioner Robert Califf, MD Food and Drug Administration 10903 New Hampshire Ave Silver Spring, MD 20993-0002

VARIOUS STATE BOARDS REVIEWING THESE ISSUES

Dr. William L. Harp, Executive Director Virginia Board of Medicine 9960 Mayland Drive, Suite 300 Henrico, VA 23233	Michael Arismendez, Executive Director Texas Dept. of Licensing and Regulation P.O. Box 12157 Austin, Texas 78711
Pamela Goose, Executive Director State Committee on Psychologists 3605 Missouri Boulevard P.O. Box 1335 Jefferson City, MO 65102-1335	Anne Thompson, Policy Analyst Oregon Health Authority 1430 Tandem Ave. NE, Suite 180 Salem, OR 97301

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Stephanie Vaughn, HSQA Regulatory Affairs Washington State Department of Health 111 Israel Rd SE Tumwater, WA 98501	David Fye, Esq, Executive Director Kansas Behavioral Sciences Regulatory Board Eisenhower State Office Building 700 S.W. Harrison St, Ste 420, Topeka, KS 66603-3817
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ADDITIONAL BODIES

Joe Bhatia, Chief Executive Officer American National Standards Institutes 1899, L Street Suite 1100 Washington DC 20036	Dr. Vijay Krishna, VP, Credentialing ANSI National Accreditation Board 1899, L Street Suite 1100 Washington DC 20036 vkrishna@anab.org
Denise Roosendaal, Executive Director Institute for Credentialing Excellence 2001 K Street NW 3rd Floor North Washington, DC 20006	Her Excellency Michelle Bachelet Jeria, MD High Commissioner United Nations Human Rights Commission Palais Wilson 52 rue des Pâquis CH-1201 Geneva, Switzerland
Robbi Cooper, Disability Advocate Decoding Dyslexia Texas	

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**SENT VIA ELECTRONIC MAIL
SENT VIA US POSTAL SERVICE**

Monday, April 11, 2022

Subject: Concerns Regarding the Abuses in the Practice of Behavior Analysis

Mr. President, Madam Vice President, Members of Congress, Cabinet Secretaries, and

Organizational Leaders:

I am deeply troubled that I must write you today, but it is time to address various problems that are taking place in the field of behavior analysis. To give you a brief history, the field of behaviorism, now behavior analysis was introduced in the 1930's by Dr. B.F. Skinner based on the belief that covert behavior including cognition and emotions are subject to the same environmental variables as observable behavior. This became known as radical behaviorism¹.

Even though the field is relatively old, the licensure and certification of behavior analysts is relatively new. The first states to create the License Behavior Analyst credential started in 2009. Presently, 34 states have a credential in behavior analysis. Most states have created a statute that requires someone to be certified in behavior analysis by a credentialing board that is certified by the ANSI National Accreditation Board or the National Commission on Certifying Agencies. For example, you can see the statute in the State of Texas². However, despite this, many behavior analysis boards made up of mostly individuals certified by the Behavior Analyst Certification Board and they have created administrative rules that block

¹ <https://psychology.fas.harvard.edu/people/b-f-skinner>

² <https://statutes.capitol.texas.gov/Docs/OC/htm/OC.506.htm>

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other certifying boards besides their own. This is because the Behavior Analyst Certification Board and the Association of Professional Behavior Analysts have engaged in anti-competitive practices and degrade other organizations rather than collaborating with them³. In fact, the Association of Professional Behavior Analysts has engaged in tactics meant to mislead state governments.

This should be of grave concern for the government because as you are aware, there are limitations to the how the government cannot force citizens to associate with 3rd parties to enjoy certain liberties. Further, the Behavior Analyst Certification Board continues to certify various board members of the Judge Rotenberg Center in Canton, Massachusetts. The leadership allows the staff to electrocyte, and shock students⁴ diagnosed with Autism for what they call bad behavior, however this can be reasonable things such as not taking off a coat because the patient is cold. This is a grave violation of consent. They are violating these most vulnerable students who are helpless and unable to advocate for themselves so they can make nearly \$200,000 a year. You should know, the United Nations has designated this practice led by Board Certified Behavior Analysts as physically torturing the disabled⁵. To date, the Behavior Analyst Certification Board says they do not have the jurisdiction to revoke the certification of the people and leadership engaging in this horrible practice. But on the opposite, they continue to claim that they are the best, specifically the “leaders,” to determine the ethics and competency of behavior analysts across the county⁶. You can read more about this in a book

³ https://www.capitol.hawaii.gov/Session2017/Testimony/SB739_TESTIMONY_CPH_02-24-17.PDF

⁴ <https://www.youtube.com/watch?v=Ko-ip3MIImik>

⁵ <https://www.documentcloud.org/documents/2300749-report-of-the-special-rapporteur-on-torture.html>

⁶ <https://www.BehaviorAnalystCertificationBoard.com/about/>

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written by Dr. Jan Nisbet, Senior Vice Provost for Research at the University of New Hampshire titled Pain and Shock in America: Politics, Advocacy, and the Controversial Treatment of People with Disabilities⁷.

Torture is likely a violation of many peoples First Amendment rights under religious views and since many state governments require you to be certified by the Behavior Analyst Certification Board to obtain a license in behavior analysis. This is on the same level of what happened to George Floyd. I encourage you and deeply implore you to watch the YouTube linked video above.



Figure 1: Student with Autism Tied Face Down and Shocked 37 Times

Finally, there are some other things to consider:

- The BEHAVIOR ANALYST CERTIFICATION BOARD is engaging in anti-competitive practices in violation of the law:
 - Outside of fighting various legislatures to only allow their certification for licensure, they have created a secret mailing list hidden from the public where

⁷ <https://press.uchicago.edu/ucp/books/book/distributed/P/bo122975350.html>

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the board can conspire with various state boards to make sure they are the only accepted for licensure.

- Our organization being greatly concerned by these actions taken by the BEHAVIOR ANALYST CERTIFICATION BOARD filed articles of corporation as a non-profit corporation in Texas. We then applied for 501(c)3 tax-exempt status. This is currently pending. We have planned to offer the following certifications once we are able to:

- **PRACTITIONERS**

- Board Certified Animal Behavior Practitioner (BC-ABP)
- Board Certified Chemical Dependency Behavior Practitioner (BC-CDBP)
- Board Certified Clinical Mental Health Behavior Practitioner (BC-CMHBP)
- Board Certified First Responder Behavior Interventionist (BC-FRBI)
- Board Certified Intellectual Disabilities Behavior Practitioner (BC-IDBP)
- Board Certified Sex Addiction Behavior Practitioner (BC-SABP)

- **EXAMINERS**

- Board Certified Behavior Examiner (BCBE)
- Forensic Behavior Analyst – Board Certified (FBA-BC)
- Organizational Behavior Analyst – Board Certified (OBA-BC)

- **SCIENTIST**

- Experimental Human Behavior Analyst – Board Certified (EHBA-BC)

- **ACADEMIC**

- Education Behavior Practitioner – Board Certified (EBP-BC)

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- Board Certified Behavior Analysis Instructor (BCBAI)
 - Conversion – diplomat status
 - Diplomate of Behavior Medicine (DBM) – Psychiatrists
 - Diplomate of Behavior Psychology (DBP) – Psychologists
 - Associate Diplomate of Behavior Medicine (DBM)SM – Psychiatric Nurse Practitioners, Physician Assistants Associate
 - Diplomate of Behavior Psychology (DBP) – Master level Clinicians – LPC, LMFT, LCDC, LCSW, etc...
- We received a letter from Attorney David Kelly threatening our non-profit organization saying that the highlighted certification names could not be used because they were too close to Board Certified Behavior Analyst.
 - In addition, the attorney threatened me personally with litigation by stating that I could not say I was Board Certified in Behavior Analysis or as a Behavior Analyst because it would infringe on their trademark. I let him know that under 15 USC 1125 (c)(3) that since I was triple board certified as a behavior analyst by the Virginia Board of Medicine, Qualified Applied Credentialing Board, and the International Behavior Analysis Organization (Board) that I was using the term board-certified to describe myself and not as a service offered or trade, I therefore was exempt from civil action⁸. They are clearly intent on blocking any other agencies from existing. Apparently, unlike other fields such as nursing,

⁸ <https://www.law.cornell.edu/uscode/text/15/1125>

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psychology, addiction, counseling, etc. the Behavior Analyst Certification Board intends to fight against any other behavior analysis certification rather than collaborate.

- The BEHAVIOR ANALYST CERTIFICATION BOARD lacks diversity and is even getting worse at its standards for diversity. 85% of its certified are female with just over 13% of its certified as male. 0.38% are American Indian/Natives. 6.61% are Asian. 9% of Behavior Analysts are African American. 21% are Hispanic⁹. This is a real problem for disadvantaged communities and people who prefer a male analyst in healthcare.
- 72% of its certified are practitioners in the field of Autism Spectrum Disorder and 10% choose not to identify. That leaves 12% of individuals to work in other fields. This leaves the following number of analysts in the United States:
 - Sports/Fitness – 39
 - Organizational - 365
 - Education - 6701
 - Public Policy – 49
 - Research - 19
 - Corrections - 49
 - Supervision - 177
 - Intellectual Disability - 2734
 - Child Welfare - 99

⁹ [https://www.Behavior Analyst Certification Board.com/Behavior Analyst Certification Board-certificant-data/](https://www.BehaviorAnalystCertificationBoard.com/BehaviorAnalystCertificationBoard-certificant-data/)

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- Parent Training - 493
- Higher Education - 642
- Pediatrics - 458
- Clinical Behavior Analysis - 1762
- Gerontology - 62
- Addiction – BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Animal - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Prevention Behavior - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Life Coaching - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Non-Profit - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- LGBTQ - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Learning Disability - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Sexual Behavior - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Environment Preservation - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- Security Analysis - BEHAVIOR ANALYST CERTIFICATION BOARD Doesn't Track
- The BEHAVIOR ANALYST CERTIFICATION BOARD seeks to oust other qualified supervisors from supervising behavior technicians, assistant behavior analysts, and aspiring behavior analysts. While psychologists, psychiatrists, social workers, professional counselors, and other related fields retain the right to practice behavior analysis, the BEHAVIOR ANALYST CERTIFICATION BOARD does not recognize them as supervisors of behavior analysis. They recognize their certified BCBA's and their

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approved VC Instructors. But a psychiatrist at a mental health institution engaged in the reduction of maladaptive behaviors cannot supervise technicians according to the organization¹⁰.

- The Association for Professional Behavior Analysts will attempt to mislead you into believing that requiring certification from one organization is routine, but this is entirely inaccurate. What is typically required is the passage of an examination by an organization. Unfortunately, the BEHAVIOR ANALYST CERTIFICATION BOARD is not like most organizations that offer examinations because they do not allow individuals to take the exam based on the federal or state government requirements nor do they allow individuals to take the exams without becoming certified by their agency or forcing them to affiliate. The BEHAVIOR ANALYST CERTIFICATION BOARD differs in this from other organizations such as National Board for Certified Counselors, Association of State and Provincial Psychological Boards, Association of Social Work Boards, International Certification and Reciprocity Consortium, Educational Testing Service, and many others. These cover Counseling, Psychology, Social Work, and Chemical/Substance Abuse, and School Psychology. These agencies are the leaders in mental health, and they allow individuals who are qualified to take their exams without requiring certification. In the case of Advanced Nurse Practitioners, there are multiple boards that are accepted for APRN practice.

¹⁰ <https://www.Behavior Analyst Certification Board.com/bcba-handbook/>

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- The Behavior Analyst Certification Board has announced that starting in 2023 it will no longer issue certifications globally¹¹. This creates a big problem for international students, military families, and those coming to the US from abroad. Not only will they not be able to get certified but given the Behavior Analyst Certification Boards monopoly hold on the licensing, they will be unable to obtain licensure without starting the supervision process over. People who want to practice via tele-health are blocked from getting licensed due to the restriction of one credential not offered overseas. Further, the exams that were previously offered in multiple languages are now discontinued by the Behavior Analyst Certification Board.

LEGAL CONSIDERATIONS

- First, as everyone is aware, the Bill of Rights does not apply to private entities. However, the government, if complicit, with a corporation could still violate the rights of the people. When the State of Massachusetts paid the Judge Rotenberg Center \$1.7 million, the government funded a program that shocks children¹².
- Second, the federal and state government paying for the shocking of disabled children to “punish them” with the intent of decreasing a specific behavior is a grave violation of the Eighth Amendment. They receive Medicaid funding¹³. Being shocked because you are unwilling to take off your coat is cruel and highly unusual. We don’t even treat prisoners at Guantanamo Bay this way.

¹¹ <https://press.uchicago.edu/ucp/books/book/distributed/P/bo122975350.html>

¹² <https://commonwealthmagazine.org/education/time-to-end-public-funding-of-judge-rotenberg-center/>

¹³ <https://autistichoya.files.wordpress.com/2013/04/cms-letter-to-ma-eohhs-11jul12.pdf>

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- Third, the Behavior Analyst Certification Board is aware of such actions and is not holding its own certified accountable for the actions they have taken while participating in this horrific human rights violation. Although, it does not require any particular behavior, federal nor state governments can force people to associate with an organization to enjoy liberties like practicing behavior analysis. As it stands now, in many states you would be forced to be certified by the Behavior Analyst Certification Board to be licensed. That means a citizen would have to give up various First Amendment rights to practice which is unlawful. We submit to federal and state legislatures that any language that forces a citizen to associate with a specific organization, is unlawful. We intend to challenge such statutes in federal court.
- Fourth, the Behavior Analyst Certification Board has engaged in anti-competitive practices. Its secret email list with state regulators is intended to be hidden from the public so that they can engage in non-transparent practices. The only reason we became aware of this secret email list was because the Texas Department of Licensing and Regulation was required to disclose it in a Public Information Act Request by law. You can view the email server that access this secret list by visiting: <http://list.BehaviorAnalystCertificationBoard.com>.
- Fifth, the Behavior Analyst Certification Board has abused the US Trademark system by trademarking generic-descriptive names so that their attorneys can threaten people and charities for using those descriptors or anything broadly close. They do this to block any other organizations from attempting to certify in behavior analysis.

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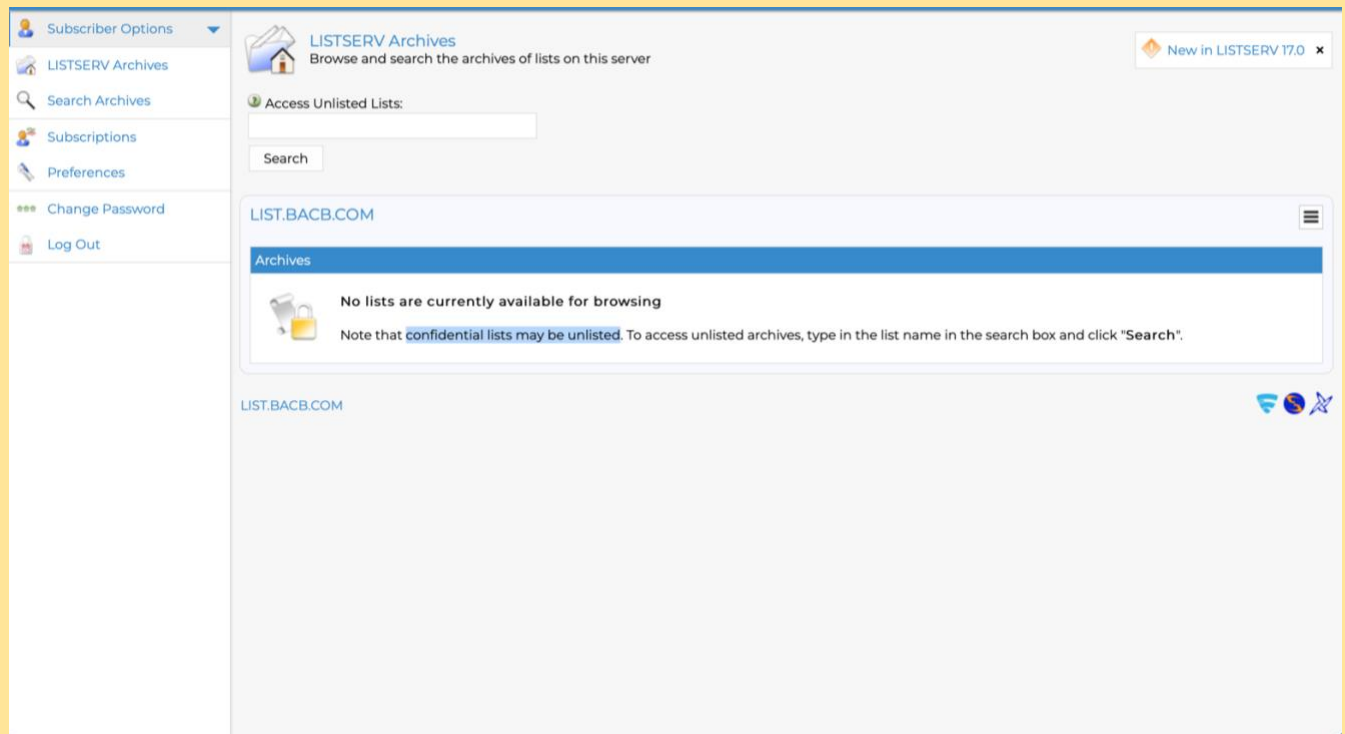


Figure 2: The Hidden Behavior Analyst Certification Board Private Email Server

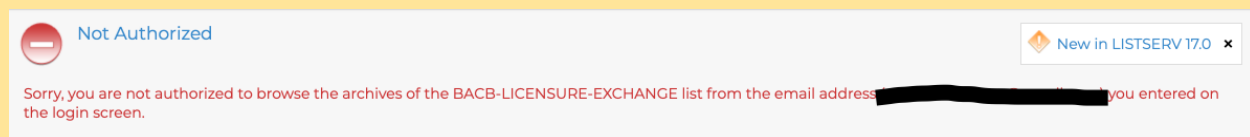


Figure 3: Behavior Analyst Certification Board Blocking Public From Seeing Communications with Regulators

- Sixth, the Behavior Analyst Certification Board has discriminated against people outside of Autism Spectrum Disorder. They have created culture that to be licensed by the government, you must be certified by them. One of their certification requirements is supervision. Of their approved supervisors, 72% are Autism based. This leaves less than 5,000 people in the field of behavior analysis throughout world to deal with ADHD, PTSD, Substance Addiction, Sex Addiction, Gambling, Animal Behavior, Forensic Analysis, etc. All of these have maladaptive behaviors that can be addressed by a behavior analyst. Under the Americans with Disabilities Act of 1990 (a), Congress found that

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“individuals with disabilities continually encounter various forms of discrimination,
including outright intentional exclusion, the discriminatory effects of architectural,
transportation, and communication barriers, overprotective rules and policies, failure to
make modifications to existing facilities and practices, exclusionary qualification
standards and criteria, segregation, and relegation to lesser services, programs,
activities, benefits, jobs, or other opportunities.”

They have made it nearly impossible for someone outside of Autism to get treated by a behavior analyst effectively. This is a violation of 42 U.S. Code § 12182 - Prohibition of discrimination by public accommodations which states “No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.”

This is blanket discrimination.

- Seventh, while the Behavior Analyst Certification Board as an ADA process for its exam, it does not have an ADA process for those under supervision.
- Eighth, the Behavior Analyst Certification Board has conspired with Association of Professional Behavior Analysts to circumvent the law under its 501(c)3 tax exemption. The Behavior Analyst Certification Board pushes its members to the Association of Professional Behavior Analysts¹⁴. The Association of Professional Behavior Analysts states on its website “the Behavior Analyst Certification Board, Inc. is an international

¹⁴ <https://www.bacb.com/for-regulators/>

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organization concerned with professional interests, it is a credentialing body rather than a membership organization and is constrained in its involvement in certain activities by virtue of its mission and its 501(c)(3) nonprofit status¹⁵ that is where they come in, they do what the Behavior Analyst Certification Board cannot on behalf of them.

1. Ninth, the 10th Amendment gives the powers not delegated to the United States to the states, not corporations such as the Behavior Analyst Certification Board or the Association of Professional Behavior Analysts. The government should be required to do its job rather than outsource to one corporation. If the state chooses not to retain its right the Constitution does not say the rights, then get transferred to a 3rd party corporation... it says just the opposite “reserved to the States respectively, or to the people.”
- Tenth, using Texas as an example, there is an emergent need for additional ABA providers. Licensed Behavior Analysts take on an average case load of 15 clients at the maximum. There is a total of 3,577 behavior analysts in Texas. In Texas, 201,617 minors have Autism,¹⁶ that means that currently to offer ABA to just student with Autism behavior analysts would have to take on a caseload of 56 clients. Currently of the 201,617 students with Autism, if the average behavior analyst took a normal case load of 15, only 53,655 students would receive care. This monopoly has created a crisis. Every day that goes by makes it harder to intervene because it is best to start services as young as possible.

¹⁵ <https://www.apbahome.net/page/About>

¹⁶ <https://www.hhs.texas.gov/sites/default/files/documents/laws-regulations/reports-presentations/2020/texas-autism-council-report-april-2019.pdf>

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- Eleventh, still using the State of Texas as an example, many states have carved out various exemptions. However, it has missed so many things. Here are a few examples of those practicing in accordance with the above definition and by virtue of practicing are in violation of the law:
 - a. Prison Guards – They have someone in a different environment, they attempt to modify their behavior and rehabilitate prisoners. Prisoners are punished for bad behavior and rewarded for good behavior. Prison Guards do not have a scope of practice that includes Applied Behavior Analysis.
 - b. Psychiatric Technicians – While behavior technicians under the supervision of a Licensed Behavior Analyst (BCBA), those implementing psychiatric behavior analysis at a mental hospital are doing so under a psychiatrist and are not covered by the law. The psychiatrist would be covered by the law, but the technicians are not licensed in the State of Texas and therefore would not be exempt from the implementation of behavior analytic services.
 - c. Federal Behavior Analysts – Members of the FBI's NCAVC Behavior Analysis Unit get requests from federal, state, local, and international law enforcement and some days can be in a state for many days. Under Section B above, they would only be covered for 20 days and that is assuming they are licensed in another state. Most empirical behavior analyst do not require licensure.
- Twelfth, the Fourteenth Amendment requires equal treatment under the law. However, this is not taking place. They are treating different certification boards as less when they are equally as qualified. Further, rules are created in most states by behavior analyst

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advisory boards. But these boards represent the Behavior Analyst Certification Board only. In no state to date is any other certification board represented despite there being many.

PATH FORWARD AND SUGGESTIONS

- First and foremost, I encourage the Office of Civil Rights at the Department of Justice to continue its investigation into the Judge Rotenberg Center in Canton, MA. This practice is child abuse and those responsible must be held accountable for their grave human rights violations against the disabled.
- Second, I implore the Food and Drug Administration to stay the course and continue fighting this grave injustice in court. For everyone else's reference, the case is JUDGE ROTENBERG EDUCATIONAL CENTER, INC. v. U.S. FOOD AND DRUG ADMINISTRATION (1:17-cv-02092) in the District Court of the District of Columbia.
- Third, I request that the Federal Trade Commission open an investigation into the anti-competitive behavior of the Behavior Analyst Certification Board. Also, address states that willingly create a monopoly by blocking alternative certification boards.
- Fourth, I implore the Department of Defense to continue working with other providers outside the Behavior Analyst Certification Board
- Fifth, I implore both Houses of Congress at the Federal and State level to open an investigation into the practice of behavior analysis and the standards surrounding the field. I would be happy to testify in an open hearing about the abuses, manipulation, segregation, and other negative impacts the Behavior Analyst Certification Board has on the field of behavior analysis and psychology.

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- Sixth, in the coming days our organization will take initiative to work on presenting rules that ban the use of electric shock devices. Further, we will seek to amend rules to include other certification boards in behavior analysis.
- Seventh, I ask the Department of Education to continue its investigation into the State of Texas and the way it treats the disabled. Further, I ask that you consider opening an investigation into the Texas Department of Licensing and Regulation who is ultimately responsible for Dyslexia Practitioners and Behavior Analysts as they continue to fail in their responsibilities of making providers available. Frankly, the Texas Education Agency and the Texas Behavioral Health Executive Council should have been given jurisdiction over these fields not the agency that handles electric work, air conditioners, and tow trucks. It's no wonder this is failing. Also, the behavior analysis advisory board has not met in over a year. Nor has the Dyslexia Therapy Advisory Committee. Therefore, the state continues to have problems because they are derelict in their duties.
- Eight, I ask the Internal Revenue to open an investigation into both the Behavior Analyst Certification Board and its co-conspirer the Association of Professional Behavior Analysts. Based on the lobbying, monopolistic, and anti-trust actions. These actions have led to their Board of Directors and their certified personally benefiting from their non-profit "charity" status. Because less providers means more money and clients for them. I will use a different state this time. In the State of Virginia, the head of the association, Amanda Randal, BCBA makes over \$6,000¹⁷ for each speaking engagement she attends

¹⁷ <https://atlanticspeakersbureau.com/dr-amanda-randall-autism/>

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and has hired a public relations firm to represent her. It is time to stop worrying about speaking engagement and book deals and to focus on the client.

Ladies and Gentlemen: we **MUST** act. The Behavior Analyst Certification Board is a threat to the various intellectually disabled communities. They cannot be allowed to continue or we at the bare minimum must offer consumers an alternative to the organization credentialing those engaging in human rights violations.

I applaud the United Nations for calling this what it is, torture.

I applaud the work done by Dr. Jan Nisbet.

I appreciate the work of the various state boards who have already begun talking about this issue.

Our organization will stand alongside them and continue to fight against these grave violations.

Very Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Moates', with a long horizontal stroke extending to the right.

Prof. Michael Moates, MA, QBA, LBA, QMHP-R

Executive Director, Global Inst. For Behavior Practitioners and Examiners

Licensed Behavior Analyst, Virginia Board of Medicine

Adjunct College Professor, University of the People

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